

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Timothy E. Edquist, Special Agent of the Federal Bureau of Investigation (FBI), United States Department of Justice, hereinafter referred to as Affiant, being duly sworn under oath, hereby deposes and states as follows:

I am a Special Agent with the FBI, and I am an “investigative or law enforcement officer” of the United States within the meaning of 18 U.S.C. § 2510(7) and Federal Rule of Criminal Procedure 41(a)(2)(C), in that I am an officer of the United States empowered by law to conduct criminal investigations and make arrests for offenses enumerated in 18 U.S.C. § 2516. I have been employed by the FBI since September of 2008, and have been a law enforcement officer since February of 2013. I am currently assigned to the FBI’s Cleveland Division’s Akron Resident Agency (RA), where I primarily investigate a variety of criminal matters involving violations of Federal laws. Additionally, I regularly work with members of the FBI’s Greater Akron Area Safe Streets Task Force. I have gained experience through training at the FBI Academy in Quantico Virginia, a variety of on the job training seminars, and from everyday work relating to conducting investigation like the one described herein. While employed by the FBI, I have investigated bank robberies, as well as larcenies involving bank Automated Teller Machines (ATM), drug trafficking organizations, violent criminal street gangs, crimes against children, money laundering, kidnapping, wire fraud, computer intrusions, and other federal offenses.

Through these investigations as well as my previous training, I have become familiar with the patterns of activity regarding bank robbery and bank larceny suspects as well as the methods they employ to plan, coordinate, and conduct these thefts.

The facts contained in this affidavit are based upon information provided to me by other law enforcement officers, other witnesses, and my own personal knowledge. Since this affidavit is made for the limited purpose of supporting a Criminal Complaint, I have not set forth each and every fact learned during the course of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause for the crimes charged. Unless otherwise indicated, where actions, conversations, and statements of others are related herein, they are related in substance and in part only.

This affidavit is being submitted in support of a criminal complaints and arrest warrants. As will be shown below, there is probable cause to believe Auquan Kimanti **HOLMES**, Kordell Rayshawn **JOHNSON**, and John David **WELLS JR** engaged in conduct that is in violation of Title 18 U.S.C. § 2113(b) and 2. This affidavit is offered in support of an arrest warrants for

- Auquan Kimanti **HOLMES**, Date of Birth (DOB): XX/XX/1997 (hereinafter, “**HOLMES**”), of XXXX Satinwood Way, Rosharon, Texas,
- Kordell Rayshawn **JOHNSON**, DOB: XX/XX/1997, (hereinafter, “**JOHNSON**”), of XXXX League City Parkway, League City, Texas,
- John David **WELLS JR**, DOB: XX/XX/1997, (hereinafter, “**WELLS JR**”), of XXXX Vicksburg Estates Drive, Missouri City, Texas.

PROBABLE CAUSE

On June 15, 2022, at approximately 4:55 a.m., a dispatcher with Twinsburg Police Department (TPD) received a 911 telephone call from an identified witness regarding an incident occurring at a bank ATM in the parking lot of the Chase Bank branch located at 9023 Darrow Road, Twinsburg, Ohio. The witness observed more than one suspect operating near a Ford

pickup truck which was gold in color. As the witness observed a suspect backing the Ford pickup truck up to the ATM and another suspect handling crowbars and chains, he told the dispatcher that someone was “about ready to knock over the ATM.” The witness said that an individual was walking up to the ATM with a crowbar and that there were chains attached to the back of the Ford pickup truck. The witness then advised the dispatcher that the suspects were in the process of ripping the ATM from the foundation using a Ford pickup truck and noted that they were successful in doing so.

Moments later, the witness reportedly observed the suspects flee the area of the Ford pickup truck and ATM on foot to an area situated just east of the bank. The witness stated the suspects were picked up by another individual driving a getaway vehicle described as a Sport Utility Vehicle (SUV) which was dark in color. The witness observed the SUV traveling eastbound from the pickup location.

Minutes later, the TPD dispatcher received a call from a security representative from Chase Bank informing them that an ATM larceny just occurred at the same Chase Bank branch located at 9023 Darrow Road, Twinsburg, Ohio. The security representative informed the dispatcher that a truck with a chain was used to rip the ATM from the ground, and that the ATM and the truck remained in the parking lot following the theft. I am aware that it is typical that bank security representatives receive security alerts in real time, from a remote location, about unauthorized entry inside bank premises and/or unlawful tampering with bank property. Bank security representatives are typically able to observe security cameras or videos in real time in order to alert area law enforcement agencies of the crimes and provide descriptions of the suspect(s).

The dispatcher immediately alerted Officers from TPD and other surrounding agencies. When TPD Officers responded to the area of the bank, an officer observed a SUV traveling eastbound away from the bank in the same general area and direction described by the witness. When the TPD Officer proceeded to catch up to and follow the vehicle, the driver of the SUV fled at a high rate of speed. At some point during the pursuit, the SUV was identified by Officers as a Volkswagen Tiguan SUV, medium blue in color, bearing Georgia license plate: CMW6185.

A high-speed pursuit of the Volkswagen SUV involving several uniformed Officers continued on multiple streets and in various directions near the downtown area of Twinsburg, Ohio. After several minutes of being pursued, the suspects crashed the Volkswagen SUV into a curb and a tree near Church Street, adjacent to the public square in downtown Twinsburg, Ohio. All three suspects exited the vehicle and fled on foot. Shortly thereafter, all three suspects were apprehended by uniformed Officers short distances from the wrecked Volkswagen SUV abandoned near Church Street. The apprehension of the three suspects involved at least one police K9 and aerial drone. Additionally, several articles of clothing, including work gloves, all dark in color, were recovered in wooded areas where suspects were ultimately apprehended.

Upon apprehending the suspects, TPD contacted FBI Akron RA and requested assistance with the bank ATM larceny investigation. I responded to the location of the accident involving the Volkswagen SUV, and later to the Chase Bank location.

Investigators were able to positively identify the three suspects who fled the Volkswagen SUV as **HOLMES, WELLS JR**, and **JOHNSON**.

Investigators determined that the Volkswagen SUV bearing Georgia license plate: CMW6185, was a rental vehicle registered to EAN Holdings. Investigators learned that the

vehicle was rented by **HOLMES** on or about June 13, 2022. In the rear passenger area of the vehicle, investigators recovered a small backpack, black in color, as well as at least one article of clothing, also black in color. Investigator recovered at least one facemask and multiple rubber gloves, both blue and white in color, in various locations inside of the vehicle. Investigators recovered a pair of pliers and a screwdriver in a rear area seat pocket of the Volkswagen SUV. Also, a cellular telephone belonging to **JOHNSON** was recovered from inside of the vehicle. Based on my training and experience, a pair of pliers and a screwdriver can be used to start an older model vehicle without a key for the purpose of stealing said vehicle.

At the scene of the Chase Bank incident, investigators learned that the Ford F-250 pickup truck abandoned at the scene of the ATM larceny was in fact a stolen from a property in nearby Stow, Ohio. When investigators initially arrived at the Chase Bank parking lot, the Ford pickup truck was encountered still on and running, with no key in the ignition, but with damage to the steering wheel column. One side of a chain, gold in color, was still attached to the rear of the Ford pickup truck, while the other end of the chain was wrapped around the ATM. The ATM was encountered laying on the ground, horizontally, at a distance of approximately eight to ten feet from the concrete based foundation where it was originally affixed. The end of the chain that was wrapped around the ATM also had a J hook affixed to its end. Also recovered on the ground near the ATM was a small hammer and a prybar. A single rubber glove was recovered on the ground underneath the ATM itself.

Investigators reviewed video and images from various traffic cameras near the major road and heavily traveled intersections in Twinsburg, Ohio. From the video and images accessible to TPD, investigators ultimately learned that at approximately 4:40 a.m., or 15 minutes prior to the first 911 telephone call, the same Volkswagen Tiguan SUV that was used by **HOLMES**,

WELLS JR, and **JOHNSON** to flee from officers moments after the ATM larceny, was observed traveling in tandem with the same Ford F-250 pickup truck found abandoned at the Chase Bank and used to remove the ATM.

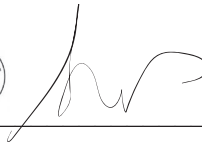
Chase Bank representatives reported that the ATM contained a large amount of United States currency at the time of the larceny (in excess of \$1,000.00).—It was reported that no currency was taken or lost during the larceny; however, the ATM was removed from its original position, carried away a distance of eight to ten feet and significantly damaged, if not entirely destroyed, during the larceny. Representatives from Chase Bank confirmed that their institution was insured by the Federal Deposit Insurance Corporation (FDIC) at the time of the larceny.

Based on the foregoing facts, I believe that probable cause exists for the issuance of complaints and arrest warrants for **HOLMES**, **WELLS JR**, and **JOHNSON**, charging them with Bank Larceny, in violation of Title 18, United States Code Section 2113(b) and 2.



Timothy E. Edquist, Special Agent
Federal Bureau of Investigation
Akron, Ohio

Subscribed and sworn to me this __16th__ day of June 2022 via telephone after submission by reliable electronic means. FED. R. CRIM. P. 4.1 and 41(d)(3).



Amanda M. Knapp, U.S. Magistrate Judge